

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

CHRISTINA M. ROBINSON, on behalf)
of herself and all others similarly situated,)

Plaintiff,)

vs.)

Case No.: 2:11-cv-02379-RMG

JURY TRIAL DEMANDED

GRACO CHILDREN'S)
PRODUCTS, INC. and)
NEWELL RUBBERMAID, INC.,)

Defendants.)

PLAINTIFF'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

Plaintiff submits her answers to Local Rule 26.01 Interrogatories as follows:

- (A) State the full name and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the bases and extent of said interest.

ANSWER:

Upon information and belief, no person or legal entity has a subrogation interest in any asserted claim.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Plaintiff requests a jury trial on all claims for damages.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding share or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

N/A

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis for any challenge to the appropriateness of the division).

ANSWER:

Plaintiff's claims are properly heard in the Charleston Division of this Court because Plaintiff resides in this Division and Defendants' product was sold in this Division.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and full case number of the related action; (2) an explanation of who the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

No.

September 6, 2011

Respectfully submitted,

RICHARDSON, PATRICK,
WESTBROOK & BRICKMAN, L.L.C.

s/ T. Christopher Tuck
A. Hoyt Rowell, III, ID No.: 3665
E-mail: hrowell@rpwb.com
T. Christopher Tuck, ID No.: 9135
E-mail: ctuck@rpwb.com
1037 Chuck Dawley Blvd.
Building A
Mt. Pleasant, SC 29464
843.727.6500

LAW OFFICES OF
GEDNEY M. HOWE, III, P.A.
Gedney M. Howe, III
8 Chalmers Street
Charleston, SC 29401
843.722.8048
E-mail: cgear@gedneyhowe.com

DOUTHIT, FRETS, ROUSE,
GENTILE & RHODES, L.L.C
R. Douglas Gentile (pending admission *pro*
hac vice)
903 East 104th Street
Suite 610
Kansas City, MO 64131
E-mail: dgentile@dfrglaw.com

ATTORNEYS FOR PLAINTIFF